

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)
)
 Plaintiffs,)
)
 v.) C.A. No. 05-823-SLR
)
 STANLEY TAYLOR, et al.,) JURY TRIAL REQUESTED
)
 Defendants.)

AFFIDAVIT IN SUPPORT OF MOTION TO COMPEL

State of Delaware)
County of Sussex)ss:

GEORGE A. JACKSON, being duly sworn, depose and says:

1. I am a plaintiff in this case. I make this affidavit in support of my motion to compel discovery.

2. Catherine Damavandi, Deputy Attorney General, on Thursday, March 20, 2008 at 11:30 am., taken oral deposition of myself.

3. At the conclusion of the deposition, Counsel for the Defendants told me once I review the deposition for any corrections or changes, return to her office. I will then received the correct version of the deposition.

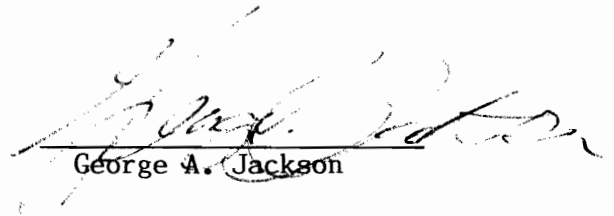
4. Or or about March 25, 2008, I made the necessary corrections and return to Defendants' Counsel office through Warden's Office.

5. Defendants' counsel did not forward or produce me with the corrected version of the deposition before filing Defendant's Motion for Summary Judgment.

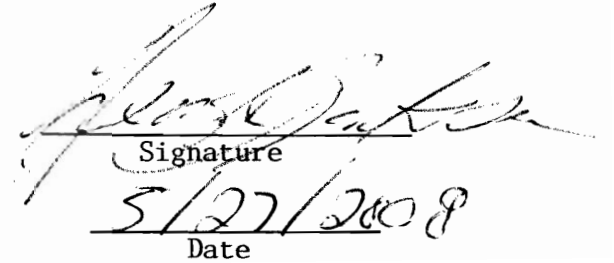
6. Defendants' Motion for Summary Judgment should be stricken as a result of their failure to produce the corrected version of the deposition in a timely manner, as set forth in the Motion accompanying this affidavit.

7. Any Defendants' objections on the ground that the discovery sought is irrelevant, burdensome and privileged have no merit, as set forth in the motion accompanying this affidavit.

WHEREFORE, the plaintiff requests that the Court grant his Motion in all respects.


George A. Jackson

Pursuant to 28 U.S.C. § 1746, I declare under penalty that the foregoing is true and correct.


Signature
5/27/2008
Date

